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13	, ,	
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15	UNITED STATES DISTRICT COURT	
16	NORTHERN DISTRICT OF CALIFORNIA	
17		
18	KIRK LONG, individually, on behalf of all) CASE NO.: C 07 2746 MJJ
19	others similarly situated, and on behalf of the general public,)) STIPULATION AND [PROPOSED]
20	Plaintiff,	 ORDER GRANTING DEFENDANT AN EXTENSION TO AUGUST 2, 2007 TO RESPOND TO COMPLAINT AND
21	v.) FOR TOLLING
22	SAFECO INSURANCE COMPANY OF AMERICA,) Complaint Filed: May 24, 2007
23)
24	Defendant.	
25	WHEREAS, on May 24, 2007, Plaintiff filed this action on behalf of himself and a	
26	proposed Fair Labor Standards Act Collective Class ("FLSA Putative Class") and California	
27	Rule 23 Class of Safeco Field Examiners; and	
28		1- 3144484.1
	DEFENDANT AN EXTENSION TO AUGUST 2, 2007 TO RESPOND TO COMPLAINT	

l l		
1	WHEREAS, Plaintiff served Defendant with the Complaint on June 15, 2007; and	
2	WHEREAS, Defendant has requested an additional 28 days to investigate the allegations	
3	of the Complaint to competently respond to the sixty (60) paragraphs of allegations regarding	
4	current and former employees around the country;	
. 5	WHEREAS, in exchange for an extension of time to file a responsive pleading to the	
6	Complaint, Plaintiff has requested that the statute of limitations for the FLSA Putative Class be	
7	tolled for a period of 28 days;	
8	NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED among the	
9	parties, through their attorneys, that Defendant shall have until August 2, 2007 to file a	
10	responsive pleading to the Complaint, and that the applicable statutes of limitations or other	
11	deadlines for the filing of claims or consents to sue by the members of the FLSA Putative Class	
12	are tolled for a period of 28 days, from July 5, 2007 until August 2, 2007.	
13	6H1	
14	Dated: July 5, 2007 Peter Rukin	
15	Attorney for Plaintiff	
16		
17	Dated: July 6, 2007 Fred W Alwarez	
18	Attorney for Defendant	
19		
20	Good Cause appearing, it is APPROVED and IT IS SO ORDERED	
21		
22	Dated: July , 2007	
23	Honorable Martin J. Jenkins United States District Court Judge	
24	Officer States District Countrings	
25		
26	·	
27		
28	STIPULATION AND [PROPOSED] ORDER GRANTING -2- , 3144484.1	
	DEFENDANT AN EXTENSION TO AUGUST 2, 2007 TO RESPOND TO COMPLAINT	

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STIPULATION AND [PROPOSED] ORDER GRANTING DEFENDANT AN EXTENSION TO AUGUST 2, 2007 TO RESPOND TO COMPLAINT CLASS ACTION NO. C 07 2746